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October 1, 2003 T.R.A. DOCKET ROOM

IN RE:)	
CITIZENS TELECOMMUNICATIONS)	Docket No. 03-00410
COMPANY OF THE VOLUNTEER STATE)	And
TARIFF TO CLARIFY LANGUAGE – Tariff)	Docket No. 03-00411
Number 2003592)	
And)	
CITIZENS TELECOMMUNICATIONS CO. OF)	
TENNESSEE TARIFF TO CLARIFY)	
LANGUAGE – Tariff Number 2003593)	

**AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, LLC'S REQUEST
TO INCLUDE ADDITIONAL ISSUE IN INDUSTRY WORKSHOP**

On September 5, 2003, the Tennessee Regulatory Authority ("TRA") issued an Order in this proceeding which announced an industry workshop to address issues raised by new tariffs filed by Citizens Telecommunications Company of the Volunteer State and by Citizens Telecommunications Company of Tennessee (collectively, "Citizens"). Specifically, the Authority approved the tariffs "conditionally" and appointed Director Ron Jones to convene a workshop "to gather information from the telecommunications industry" regarding the provision of "county-wide calling," pursuant to T.C.A. § 65-21-114, and to address whether the revised tariffs are consistent with that statute. On September 16, 2003, Director Jones issued an order asking all carriers to submit information about the county-wide calling workshop and to "provide a suggestion for how this workshop should proceed."

AT&T Communications of the South Central States, LLC ("AT&T") is a party to these proceedings and intends to participate in the industry workshop concerning Citizens' tariffs and the county-wide calling requirement. In response to Director Jones' request for suggestions about the conduct of the workshop, AT&T requests that the workshop also address another,

related issue raised by the amended tariffs: the exchange of traffic between an independent (non-BellSouth) incumbent local exchange carrier ("ICO") and a competing local exchange carrier ("CLEC") operating outside the ICO's service area but in the same local calling area.

As the Authority is aware, there are many locations in Tennessee where a CLEC operating in the service area of BellSouth exchanges traffic with an ICO, such as Citizens, which is located in the same local calling area. Depending on the volume of traffic between the ICO and the CLEC, the two carriers may interconnect directly with each other or may interconnect indirectly by using BellSouth as the intermediary or "transit" carrier. To AT&T's knowledge, most CLECs and ICOs operating in Tennessee exchange traffic indirectly (through BellSouth) and many CLECs and ICOs do not have interconnection agreements with each other. Given the large number of ICOs in Tennessee and the relatively small amount of local traffic that is exchanged between a particular CLEC and a particular ICO, many CLECs and ICOs have not chosen to spend time and resources negotiating interconnection agreements. Moreover, in the absence of a direct connection, it is also unclear whether an interconnection agreement is practically necessary or legally required.

Citizens' new tariffs appears to change the current relationship between Citizens and a CLEC operating in the same local calling area. The revised language states:

Frontier^[1] will not originate calls to a TSP's [CLEC's] NXX that is within the local calling scope of the calling party until an interconnection agreement or traffic interchange agreement with Frontier has been fully executed and proper facilities are in place.

Thus, contrary to the current practice in the industry, the new tariffs state that Citizens will not exchange local traffic with any CLEC until after Citizens and the CLEC have entered into an "interconnection agreement or traffic exchange agreement" and after "proper facilities are

¹ Citizens operates in Tennessee under the name Frontier.

in place" for the exchange of traffic. The tariff suggests that Citizens is now required to stop exchanging local traffic with any CLEC which does not presently have such an agreement in place.² While AT&T does not disagree with Citizens that such agreements are appropriate, AT&T also believes that it is appropriate -- and required by the federal Telecommunications Act -- for the parties to continue exchanging traffic while negotiating these agreements. Furthermore, even if Citizens has agreements with some CLECs or does not intend to stop exchanging traffic with a CLEC without giving the CLEC an opportunity to enter into an agreement, the tariff also appears to give Citizens unilateral discretion to dictate whether "proper facilities are in place." This presumably would allow Citizens to whether the CLEC is required to interconnect directly or indirectly with Citizens. As previously stated, that decision should hinge on the volume of traffic exchanged between the two carriers. Citizens should not be able to require a direct connection if the level of traffic does not justify a direct connection.

In sum, the revised tariffs raise significant issues which could result in the disruption of local traffic between Citizens and CLECs. See footnote 2, below. The same problems will also arise if other ICOs follow the lead of Citizens. Since the Authority has already decided to convene an industry workshop to address the related issue of county-wide calling,³ AT&T believes the workshop will provide a convenient opportunity to address the impact of interconnection language raised in the revised tariffs as well as a general discussion of the terms and conditions upon which local traffic is exchanged between CLECs and ICOs. A workshop

² This concern is not hypothetical. AT&T has recently learned that Citizens has been blocking seven digit local calls made by Citizens' customers in the Knoxville area to customers served by ITC^DeltaCom. Such a customer is unable to complete the call unless he dials it as a long distance number. DeltaCom does not know whether Citizens also bills the customer for a long distance call. Citizens apparently began blocking these calls after DeltaCom declined to sign the interconnection agreement proposed by Citizens and suggested instead an alternative agreement.

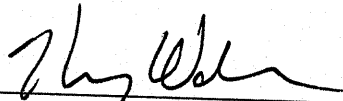
³ The issues are related because, as described in footnote 2, supra, Citizens currently requires its customers to make a long distance call in order to reach an ITC^DeltaCom customer located in the same county. Neither AT&T or ITC^DeltaCom is aware of how the customer is billed for the call.

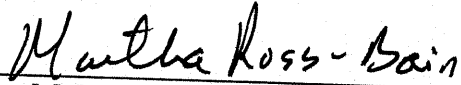
will allow all interested carriers to discuss these matters in an informal setting and, perhaps, avoid both service interruptions and the formal proceedings such interruptions often provide.

For these reasons, AT&T requests that the workshop be broadened to include a discussion of these ICO – CLEC issue.

Respectfully submitted,
BOULT, CUMMINGS, CONNERS & BERRY, PLC

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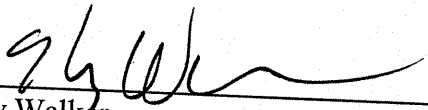

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CERTIFICATE OF SERVICE

This is to certify that I have this day caused to be served by United States mail a copy of the within and foregoing Petition to Intervene upon the following person, properly addressed as follows:

J. Michael Swatts
State Government Affairs Director
Frontier
300 Bland Street
P. O. Box 770
Bluefield, WV 24701

This 25th day of September, 2003.


Henry Walker